27

28

2	Nevada Bar No. 6014 KENNEDY & COUVILLIER, PLLC		
3	3271 E. Twain Ave.		
	Las Vegas, NV 89120 Tel: (702) 605-3440		
4	Fax: (702) 625-6367		
5	mcouvillier@kclawnv.com		
6	IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA		
7	FOR THE DISTRICT OF NEVADA		
8	MICHAEL GERARD TYSON p/k/a MIKE TYSON, an individual,) Case No. 2:17-cv-02122-RFB-GWF	
9	Plaintiff,) STIPULATION AND ORDER TO EXTEND	
10	r mintiri,	TIME TO RESPOND TO COMPLAINT	
11	V.) [Seventh Request]	
12	THE BOXING HALL OF FAME, INC, a Nevada corporation, and STEVEN LOTT,))	
13	an individual,))	
14	Defendants.	ý)	
15	IT IS STIPULATED AND AGREED by counsel for the parties as follows:		
16	1. Defendants The Boxing Hall	of Fame, Inc. and Steven Lott accepted service of	
17 18	the Summons and Complaint through their counsel on November 1, 2017. By stipulation and order submitted on November 6, 2017 (ECF No. 11), the parties agreed that Defendants would		
19			
20	answer or otherwise respond to the Complaint on or before November 30, 2017.		
21	2. The parties commenced settle	ement negotiations and the Court granted a second	
22	request to extend the time to respond to the	Complaint to January 19, 2018 (ECF. No. 14). The	
23	parties submitted a third stipulated request on January 16, 2018 (ECF No. 15) extending the time		
24	until February 9, 2018, which the Court approved on January 18, 2018 (ECF No. 16). The		
25			
26	parties stipulated a fourth time on February 8, 2018 (ECF No. 17) extending the time to March 9,		
27	2018, which the Court granted on February 9, 2018 (ECF No. 18). The fifth and sixth extensions		

Todd E. Kennedy, Esq.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

were sought and granted by the Court on March 9, 2018 (ECF No. 20) and April 16, 2018 (ECF No. 22), extending the time to submit a respond to May 9, 2018.

- 3. Good faith settlement negotiations continue between the parties and final drafts for execution are nearly complete. It is anticipated that this extension will be the last one needed. The parties wish to further extend Defendants' time to respond to the Complaint to allow those negotiations to continue. They agree that a further extension is in the interest of judicial efficiency and avoids the unnecessary accumulation of costs and fees.
- 3. Accordingly, the parties stipulate that Defendants shall answer or otherwise respond to the Complaint on or before Friday, June 8, 2018.

/// /// /// /// /// /// /// /// /// /// /// /// /// /// /// /// ///

28

	1	4. This is the seventh request for an extension of time to respond to the Complai	
	2	Dated: May 8, 2018.	
	3	BAILEY KENNEDY KENNEDY & COUVILLIER	
	4	By: _/s/ Kelly B. Stout By: _/s/ Todd E. Kennedy	
	5	DENNIS L. KENNEDY Nevada Bar No. 1462 DENNIS L. KENNEDY Nevada Bar No. 6014	
	6	KELLY B. STOUT Nevada Bar No. 12105 3271 W. Warm Springs Rd. Las Vegas, Nevada 89120	
	7	8984 Spanish Ridge Avenue Telephone: 702.605.3440 Las Vegas, Nevada 89148-1302 Facsimile: 702.625.6367	
	8 9	Telephone: 702.562.8820 tkennedy@kclawnv.com Facsimile: 702.562.8821	
	10	DKennedy@BaileyKennedy.com KStout@BaileyKennedy.com Boxing Hall of Fame, Inc. and Steven Lott	
	11	JONATHAN D. DAVIS JONATHAN D. DAVIS, P.C.	
	12	10 Rockefeller Plaza, Suite 1050 New York, New York 10020	
	13	Telephone: 212.687.5464 Facsimile: 212.697.2521 JJD@jddavispc.com	
E 03.	14	Attorneys for Plaintiff	
www.kciawnv.com	15	MICHÁEL GERARD TYSON	
, , , , , , , , , , , , , , , , , , ,	16 17	IT IS SO ORDERED.	
	18	Jeorge Foley S.	
	19	UNITED STATES MAGISTRATE JUDGE	
	20	DATED: 5-9-2018	
	21		
	22		
	23		
	24		
	25		
	26		
	27		